

**STATE OF NEW MEXICO
ENVIRONMENTAL IMPROVEMENT BOARD**

IN THE MATTER OF PROPOSED NEW REGULATION, 20.2.50
NMAC – *Oil and Gas Sector – Ozone Precursor Pollutants*

No. EIB 21-27 (R)

AMENDMENTS TO THE REBUTTAL TESTIMONY OF DAVID LYON

Environmental Defense Fund submits this amended testimony to correct David Lyon’s rebuttal testimony, at EDF Exhibit XX. This amendment is to correct the reference to NMED’s estimate of VOC emissions from wellhead facilities. The former testimony inadvertently referred to NMED’s estimate of VOC emissions from non-wellhead facilities rather than wellhead facilities. Page 6 of David Lyon’s rebuttal testimony at Exhibit XX states:

“ERG estimates that the 23,969 well sites in New Mexico subject to the proposed LDAR requirements emit 7,131 tons of VOCs that can be reduced by frequent inspections.
NMED Ex. 69.”

This amendment is as follows:

“ERG estimates that the 23,969 well sites in New Mexico subject to the proposed LDAR requirements emit 18,894 tons of VOCs that can be reduced by frequent inspections.
NMED Ex. 69.”